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**From:** Piggott, Amelia [Piggott.Amelia@epa.gov]  
**Sent:** 10/29/2015 3:14:13 PM  
**To:** Chalfant, Mark [Chalfant.Mark@epa.gov]  
**Subject:** FW: CFAC/Calbag Violation letter (FID 2386 / CVID 18794)  
**Attachments:** CFAC In-process material sampling results TCLP submttd to MDEQ part 1.pdf; Anode Briquette TCLP.PDF; CFAC In-process material sampling results TCLP submttd to MDEQ part 2.pdf; MDEQ Inspection with TCLP results report Nov 7 2001.pdf

More CFAC. I just emailed Carson to say it is now your site.

Thanks,

ap

Amelia Piggott  
Attorney  
U.S. EPA Region 8  
1595 Wynkoop St.  
Denver, CO 80202  
303.312.6410

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**From:** Coate, Carson  
**Sent:** Thursday, October 29, 2015 8:56 AM  
**To:** Vranka, Joe; Land, Kelcey; Parker, Robert; Wilder, Scott; Piggott, Amelia  
**Subject:** FW: CFAC/Calbag Violation letter (FID 2386 / CVID 18794)

FYI

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**From:** Steve Wright [mailto:swright@cfaluminum.com]  
**Sent:** Wednesday, October 28, 2015 9:54 AM  
**To:** Rieger, Michael <MRieger@mt.gov>  
**Cc:** Coate, Carson <Coate.Carson@epa.gov>; jim.perris@calbag.com; Joe Russell <jrussell@flathead.mt.gov>; mahall@mt.gov; Mikita, Cory <CMikita@mt.gov>; ethamke@mt.gov; Schmidt, Carol <CSchmidt3@mt.gov>; Mullen, Norman <nmullen@mt.gov>; Haque-Hausrath, Katherine <KHaqueHausrath@mt.gov>; Hendrickson, Mary <MHendrickson@mt.gov>; rithompson@mt.gov; Cliff Boyd <cliff.boyd@calbag.com>  
**Subject:** RE: CFAC/Calbag Violation letter (FID 2386 / CVID 18794)

Mike,

I am in the process of reviewing your Oct. 26 letter. I don't know if you are aware of prior testing of materials at CFAC, so as an initial matter, I thought I would bring you up to date by providing you with the attached analyses showing the CFAC materials did not test hazardous.

With respect to the anode carbon and aluminum busbar, which have economic value, I do not see how these could be a waste under the ARM 17.50.502(41).

Thank you for providing your recommendations and I will discuss with Calbag.

Steve Wright

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**From:** Rieger, Michael [<mailto:MRieger@mt.gov>]

**Sent:** Monday, October 26, 2015 9:07 AM

**To:** Cliff Boyd; Steve Wright

**Cc:** Rieger, Michael; [coate.carson@epa.gov](mailto:coate.carson@epa.gov); [jim.perris@calbag.com](mailto:jim.perris@calbag.com); Joe Russell; Hall, Mark (DEQ); Mikita, Cory; Thamke, Ed; Schmidt, Carol; Mullen, Norman; Haque-Hausrath, Katherine; Hendrickson, Mary; Thompson, Ricknold

**Subject:** CFAC/Calbag Violation letter (FID 2386 / CVID 18794)

Cliff & Steve,

Attached for your convenience is a copy of my violation letter. Hard copies will be sent in the mail today. Please contact me with any questions or comments.

Mike Rieger

Enforcement Division

Department of Environmental Quality

Phone: (406) 444-3937

Fax: (406) 444-1923

[mrieger@mt.gov](mailto:mrieger@mt.gov)